

REMARKS

Claims 1-9, 11-17 and 19-24 are pending in the application. Claims 1, 11, 12, and 19 have been amended, claims 26-28 have been added, and claims 3, 4, 13, 15, 20, and 22 have been canceled, leaving claims 1-2, 5-9, 11-12, 14, 16-17, 19, 21, 23-24, and 26-28 for consideration upon entry of the present Amendment.

Support for the amendment can be found on page 12, line 7 to page 13, line 19. As will be discussed in detail below, it is believed that the application is in condition for allowance.

On March 18, 2002, Applicants submitted the priority document. The Examiner has acknowledged the claim for foreign priority, but has not acknowledged receipt of the priority document. Applicants request that the Examiner acknowledge receipt of the priority document for this application.

Claims 1-9, 11-17, and 19-24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over WO 00/30338 in view of Manico et al. (US 6,373,551) ("Manico"). For an obviousness rejection to be proper, the Examiner must meet the burden of establishing that all elements of the invention are disclosed in the prior art and that the prior art relied upon, coupled with knowledge generally available in the art at the time of the invention, must contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or combined references. *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988); *In Re Wilson*, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970); *Amgen v. Chugai Pharmaceuticals Co.*, 927 U.S.P.Q.2d, 1016, 1023 (Fed. Cir. 1996).

Claims 1-2, 5-9, and 26 include the following limitations: "storing said data in a server computer connected to said network in association with a unique address or unique data assigned to the user; and * * * wherein said unique address or unique data is stored in a memory of said device." Claims 11-12, 14, 16-17, and 27 include the following limitations: "storage means connected to said network for storing said data in association with a unique address or unique data assigned to the user; and * * * wherein said unique address or unique data is stored in a memory of said device." Claims 19, 21, 23-24, and 28 include the following limitations: "means for storing data previously stored in a device returned by a user, in association with a unique address or unique data assigned to the user and stored in a

memory of said device." Neither WO 00/30338 nor Manico teach or suggest those limitations.

WO 00/30338 describes a structure in which a storage module 1200 transmits a unit identifier to a central server 3000. When a user establishes connection to the central server 3000 using a phone jack, the central server 3000 identifies a unit number of the storage module 1200 as, for example, 12345. However, such a unit number is a number assigned to a storage module and is not a number uniquely assigned to a user as in the present invention. If a user purchases a storage module, only as a consequence, the unit number can be used as one corresponding to the user. There is no direct correspondence between user-specific information and the unit number.

In contrast, according to the present invention, an address or data uniquely assigned to a user is stored in a memory of the device. As one example of such an address, a user's telephone number or cellular phone number can be used as described in the specification. In the present invention, because the address or data stored in the memory is uniquely assigned to the user, the user can easily become aware that the address or data is their data. This is advantageous in that the user can easily obtain access. The use such as "sanyo.service/phone number" instead of a sequence of random numbers, such as 12345, enables the user to easily obtain access to the server computer.

Furthermore, claims 26-28 further include the following limitation: "wherein said unique address or unique data is stored in a root directory area in a memory of said device." Although the memory includes a boot record area, a FAT (file allocation table) area, a root directory area, an image data area, an audio data area, and the like, the address is stored in the root directory area, which enables an effective use of the memory. In other words, user convenience is increased by storing an address or data without trading off the capacities of the image data area and the audio data area in the memory.

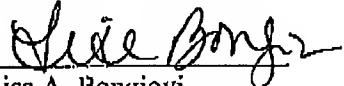
Thus, while WO 00/30338 describes that the storage module has an identifier or a unit number, there is no disclosure, teaching, or suggestion as to having a unique address or unique data assigned to the user or as to how the identifier or unit number is stored in a memory. In addition, Manico does not cure the deficiencies of WO 00/30338. Accordingly, WO 00/30338 and Manico do not teach or suggest all of the limitations of claims 1-2, 5-9, 11-12, 14, 16-17, 19, 21, 23-24, and 26-28.

In view of the foregoing, it is respectfully submitted that the instant application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued. If the Examiner believes that a telephone conference with Applicants' attorneys would be advantageous to the disposition of this case, the Examiner is cordially requested to telephone the undersigned.

In the event the Commissioner of Patents and Trademarks deems additional fees to be due in connection with this application, Applicants' attorney hereby authorizes that such fee be charged to Deposit Account No. 06-1130.

Respectfully submitted,

CANTOR COLBURN LLP

By: 

Lisa A. Bongiovi
Registration No. 48,933
CANTOR COLBURN LLP
55 Griffin Road South
Bloomfield, CT 06002
Telephone (860) 286-2929
Facsimile (860) 286-0115
Customer No. 23413

August 13, 2003

FAX RECEIVED

AUG 15 2003

GROUP 3600

OFFICIAL

YKI-0081
09/997,067